

**Hearing Date: March 21, 2023, at 10:00 a.m. (prevailing Eastern Time)**  
**Response Deadline: March 14, 2023, at 4:00 p.m. (prevailing Eastern Time)**

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*Counsel to the Initial Debtors and Debtors in Possession*

*Proposed Counsel to the GK8 Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

CELSIUS NETWORK LLC, *et al.*,<sup>1</sup>

Debtors.

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Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

**NOTICE OF HEARING ON  
DEBTORS' FIRST OMNIBUS OBJECTION TO CERTAIN  
(A) AMENDED CLAIMS, (B) DUPLICATE CLAIMS, (C) NON-DEBTOR CLAIMS,  
(D) UNSUPPORTED CLAIMS, AND (E) INACCURATELY SUPPORTED CLAIMS**

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**PLEASE TAKE NOTICE** that a hearing on the *Debtors' First Omnibus Objection to Certain (A) Amended Claims, (B) Duplicate Claims, (C) Non-Debtor Claims, (D) Unsupported Claims, and (E) Inaccurately Supported Claims* (the "Objection,")) will be held on **March 21, 2023, at 10:00 a.m., prevailing Eastern Time** (the "Hearing") before the Honorable Martin

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

Glenn, Chief United States Bankruptcy Judge. In accordance with General Order M-543 dated March 20, 2020, the Hearing will be conducted remotely using Zoom for Government. Parties wishing to appear at the Hearing, whether making a “live” or “listen only” appearance before the Court, need to make an electronic appearance (an “eCourtAppearance”) through the Court’s website at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. Electronic appearances (eCourtAppearances) need to be made by **4:00 p.m., prevailing Eastern Time, the business day before the hearing (i.e., on March 20, 2023).**

**PLEASE TAKE FURTHER NOTICE** that due to the large number of expected participants in the Hearing and the Court’s security requirements for participating in a Zoom for Government audio and video hearing, all persons seeking to attend the Hearing at 10:00 a.m., prevailing Eastern Time on March 21, 2023 must connect to the Hearing beginning at 9:00 a.m., prevailing Eastern Time on March 21, 2023. When parties sign in to Zoom for Government and add their names, they must type in the first and last name that will be used to identify them at the Hearing. Parties that type in only their first name, a nickname or initials will not be admitted into the Hearing. When seeking to connect for either audio or video participation in a Zoom for Government Hearing, you will first enter a “Waiting Room,” in the order in which you seek to connect. Court personnel will admit each person to the Hearing from the Waiting Room after confirming the person’s name (and telephone number, if a telephone is used to connect) with their eCourtAppearance. Because of the large number of expected participants, you may experience a delay in the Waiting Room before you are admitted to the Hearing.

**PLEASE TAKE FURTHER NOTICE** that any responses to the relief requested in the Objection shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and all General Orders applicable

to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) be filed electronically with the Court on the docket of *In re Celsius Network LLC*, No. 22-10964 (MG) by registered users of the Court’s electronic filing system and in accordance with all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court’s website at <http://www.nysb.uscourts.gov>); (d) be filed in accordance with the *Order (I) Approving (A) Omnibus Claims Objection Procedures, (B) Omnibus Substantive Claims Objections and Form of Notice, and (C) Satisfaction Procedures and Form of Notice and (II) Modifying Bankruptcy Rule 3007(e)(6)* [Docket No. 2090] (the “Objection Procedures Order”); and (e) be served in accordance with the Objection Procedures Order by **March 14, 2023, at 4:00 p.m., prevailing Eastern Time**, to (i) the Debtors, (ii) the official committee of unsecured creditors; and (iii) the United States Trustee for the Southern District of New York.

**PLEASE TAKE FURTHER NOTICE** that only those responses that are timely filed, served, and received will be considered at the Hearing. Failure to file a timely response may result in entry of a final order granting the Objection as requested by the Debtors.

**PLEASE TAKE FURTHER NOTICE** that copies of the Objection and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/celsius>. You may also obtain copies of the Objection and other pleadings filed in these chapter 11 cases by visiting the Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

*[Remainder of page intentionally left blank]*

New York, New York  
Dated: February 19, 2023

/s/ Joshua A. Sussberg

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,<sup>1</sup>

Debtors.

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) Chapter 11  
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) Case No. 22-10964 (MG)  
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**DEBTORS' FIRST OMNIBUS OBJECTION TO CERTAIN  
(A) AMENDED CLAIMS, (B) DUPLICATE CLAIMS, (C) NON-DEBTOR CLAIMS,  
(D) UNSUPPORTED CLAIMS, AND (E) INACCURATELY SUPPORTED CLAIMS**

**YOU SHOULD LOCATE YOUR NAME AND YOUR CLAIM(S) ON THE SCHEDULES ATTACHED TO EXHIBIT A HERETO. PLEASE TAKE NOTICE THAT YOUR CLAIM(S) MAY BE DISALLOWED, EXPUNGED, RECLASSIFIED, REDUCED, OR OTHERWISE AFFECTED AS A RESULT OF THIS OBJECTION. THEREFORE, PLEASE READ THIS NOTICE AND THE ACCOMPANYING OBJECTION VERY CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) respectfully state as follows in support of this objection:<sup>2</sup>

### **Relief Requested**

1. By this first omnibus objection, the Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”): (i) disallowing and expunging the Claims identified on (a) Schedule 1 to **Exhibit A** (collectively, the “Amended Claims”) because such claims have been amended by subsequently filed Proofs of Claim, (b) Schedule 2 to **Exhibit A** (collectively, the “Exact Duplicate Claims”) because such claims are mirror duplicates of other Proofs of Claim filed by or on behalf of the same claimant in respect of the same liabilities, and (c) Schedule 3 to **Exhibit A** (collectively, the “Non-Debtor Claims”) because such claims assert claims against non-Debtor third-party entities for which the Debtors are not liable; and (ii) modifying (to reflect the amounts listed in the Debtors’ schedules of assets and liabilities (as amended from time to time, the “Schedules” [Docket No. 974]) the Claims identified on (a) Schedule 4 to **Exhibit A** (collectively, the “Unsupported Claims”) because such claims lack supporting documentation as required by the Bar Date Order (as defined below) to support amounts exceeding what is set forth in the Schedules, and (b) Schedule 5 to **Exhibit A** (collectively, the “Inaccurately Supported Claims”) because the supporting documentation provided with such Proofs of Claim does not match the value of such Claim as listed on the Proof of Claim. Therefore, such aforementioned Claims do not have sufficient support as required by title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”) and the

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<sup>2</sup> Capitalized terms used but not defined in this objection shall have the meanings given to such terms in the *Order (I) Approving (A) Omnibus Claims Objection Procedures, (B) Omnibus Substantive Claims Objections and Form of Notice, and (C) Satisfaction Procedures and Form of Notice and (II) Modifying Bankruptcy Rule 3007(e)(6)* [Docket No. 2090] (the “Objection Procedures Order”).

Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). In support of this objection, the Debtors submit the declaration of Holden Bixler, a managing director at Alvarez & Marsal North America, LLC (the “Bixler Declaration”), attached hereto as **Exhibit B**.

### **Jurisdiction and Venue**

2. The United States Bankruptcy Court for the Southern District of New York (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated February 1, 2012. The Debtors confirm their consent, pursuant to rule 7008 of the Bankruptcy Rules, to the entry of a final order by the Court in connection with this Objection to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested herein are sections 105 and 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Objection Procedures Order.

### **The Claims Reconciliation Process**

5. On October 5, 2022, all Debtors except for GK8 Ltd., GK8 UK, and GK8 USA LLC (collectively, the “GK8 Debtors”)<sup>3</sup> filed their respective Schedules pursuant to Bankruptcy Rule 1007 and the orders extending time to file schedules of assets and liabilities [Docket Nos. 57 and 431].

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<sup>3</sup> The GK8 Debtors, who filed their respective voluntary petitions for protection under chapter 11 of the Bankruptcy Code on December 7, 2022, filed their respective schedules on January 20, 2023, in their respective cases.

6. On November 16, 2022, the Court entered an order [Docket No. 1368] (the “Bar Date Order”) establishing January 3, 2023, at 5:00 p.m., prevailing Eastern Time (the “Bar Date”), as the last date and time for most retail Account Holders to file proofs of claims based on prepetition claims (collectively, the “Proofs of Claims”) against any Debtor other than the GK8 Debtors, and January 10, 2023, at 5:00 p.m., prevailing Eastern Time (the “Governmental Bar Date”) as the last date and time for each governmental unit to file Proofs of Claim against any Debtor other than the GK8 Debtors. On January 10, 2023, the Court entered an order [Docket No. 1846] (the “Amended Bar Date Order”) extending both the Bar Date and the Governmental Bar Date to February 9, 2023, at 5:00 p.m., prevailing Eastern Time (the “Extended Bar Date”). To date, no bar date has been set as to claims against the GK8 Debtors.

7. As of the date hereof, approximately 24,903 Proofs of Claim have been filed against the Debtors, totaling approximately \$78,197,912,759.00.<sup>4</sup> Because of the large number of Claims in these cases, the Debtors sought and have been granted approval to file omnibus objections to certain Claims in accordance with the procedures set forth in the Objection Procedures Order. By this objection, the Debtors seek approval to disallow, expunge, modify, and/or reclassify certain Claims in accordance with the Objection Procedures Order for the reasons set forth below.

### **Objection**

8. Pursuant to section 502(a) of the Bankruptcy Code, a filed proof of claim is deemed allowed unless a party in interest objects thereto. *See* 11 U.S.C. § 502(a). Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in an omnibus objection.” Bankruptcy Rule 3007(d). The Objection Procedures Order expands upon

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<sup>4</sup> The total value of the filed Proofs of Claim does not include approximately 13,606 claims filed solely in cryptocurrency denominations and one claim incorrectly filed in the amount of \$117.9 quintillion as of the Petition Date.



Bankruptcy Rule 3007(d) and permits the Debtors to file an omnibus objection on additional grounds.

9. Pursuant to Bankruptcy Rule 3007 and the Objection Procedures Order, the Debtors file this objection to the Claims listed on Schedules 1–5 to **Exhibit A** on the bases set forth below and in the Bixler Declaration.

**A. Amended Claims.**

10. The Debtors object to the eighty-three Amended Claims listed in the column labeled “Claims to be Disallowed” on Schedule 1 to **Exhibit A** because the Debtors have determined that such claims have been amended and superseded by subsequently filed Proofs of Claim by or on behalf of the same claimant (or a successor thereto) on account of the same liability. Failure to disallow the Amended Claims may result in a double recovery to the claimants, to the detriment of other creditors. Disallowance or expungement of the Amended Claims will not affect the Claims identified in the column labeled “Remaining Claims” on Schedule 1 to **Exhibit A**, which will remain on the claims register maintained in these chapter 11 cases (the “Claims Register”) unless withdrawn by the applicable claimants or otherwise disallowed by the Court, subject to the Debtors’ right to object to such remaining Claims in the future on any grounds permitted by applicable law. Accordingly, the Debtors request that the Court disallow and expunge the Amended Claims from the Claims Register.

**B. Exact Duplicate Claims.**

11. The Debtors object to the twenty Exact Duplicate Claims listed in the column labeled “Claims to be Disallowed” on Schedule 2 to **Exhibit A** because the Debtors have determined that they are mirror duplicates of other Proofs of Claim filed by or on behalf of the same claimant (or a successor thereto) on account of the same liability. Failure to disallow the Exact Duplicate Claims may result in a double recovery to the claimants, to the detriment of other

creditors. Moreover, disallowance of these Exact Duplicate Claims will enable the Claims Register to reflect more accurately the Claims asserted against the Debtors. Disallowance or expungement of the Exact Duplicate Claims will not affect the “Remaining Claims” listed on Schedule 2, which will remain on the Claims Register until withdrawn by the relevant claimants or otherwise disallowed by the Court, subject to the Debtors’ right to object to the remaining Claims in the future on any grounds permitted by applicable law. Accordingly, the Debtors request that the Court disallow and expunge the Exact Duplicate Claims from the Claims Register.

**C. Non-Debtor Claims.**

12. The Debtors object to the three Non-Debtor Claims listed on Schedule 3 to Exhibit A as claims for which the Debtors are not liable. Following review of each of the Non-Debtor Claims and their supporting materials, the Debtors have determined that the Non-Debtor Claims were filed in the wrong case based on the Claim language and/or supporting documentation. The Non-Debtor Claims assert Claims against third-party entities that are not Debtors, nor affiliates of the Debtors, in these chapter 11 cases. Failure to disallow the Non-Debtor Claims in their entirety would result in the applicable claimants receiving an unwarranted recovery against the Debtors’ estates, to the detriment of other creditors. Accordingly, the Debtors request that the Court disallow and expunge the Non-Debtor Claims from the Claims Register.

**D. Unsupported Claims.**

13. The Debtors object to the thirty-three Unsupported Claims on Schedule 4 to Exhibit A, specifically the amounts listed in the column labeled “Asserted Amount,” because the Debtors have determined that such Claims failed to provide any supporting documentation to

support the amount of the claim as required by the Bar Date Order.<sup>5</sup> The Debtors seek to modify the Unsupported Claims to the amounts set forth in the column labeled “Modified Claims” on Schedule 4 to **Exhibit A**, which match the amounts listed in the Debtors’ Schedules. The Debtors seek to modify the Unsupported Claims to match the amounts listed in the Debtors’ Schedules, because such amounts are what the relevant claimant is entitled to according to the Debtors’ books and records, not any additional amount asserted that lacks supporting documentation. Failure to modify the Unsupported Claims could result in the relevant claimant receiving an unwarranted excessive recovery against the Debtors, to the detriment of other creditors. Accordingly, the Debtors respectfully request entry of an order modifying the amount of each Unsupported Claim to reflect the amounts identified in the column labeled “Modified Claims” on Schedule 4 to **Exhibit A**.

**E. Inaccurately Supported Claims.**

14. The Debtors object to the twelve Inaccurately Supported Claims listed on Schedule 5 to **Exhibit A** because the Debtors have determined that the supporting documentation provided does not support the amount of the claim. The Debtors seek to modify the Inaccurately Supported Claims to the amounts set forth in the column labeled “Modified Claims” on Schedule 5 to **Exhibit A**, which match the amounts listed in the Debtors’ Schedules. The Debtors seek to modify the Inaccurately Supported Claims to match the amounts listed in the Debtors’ Schedules, because such amounts are what the relevant claimant is entitled to according to the Debtors’ books and records, not any additional amount asserted that is unsupported by documentation. Failure to modify the Inaccurately Supported Claims could result in the relevant claimant receiving an

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<sup>5</sup> The Objection Procedures Order also permits the Debtors to object to Claims that “fail to specify sufficiently the basis for the Claim or provide sufficient supporting documentation for such Claim” as an Additional Ground (as defined in the Objection Procedures Order). See Objection Procedures Order ¶ 2.

unwarranted excessive recovery against the Debtors, to the detriment of other creditors. Accordingly, the Debtors respectfully request entry of an order modifying the amount of each Inaccurately Supported Claim to reflect the amount identified in the column labeled “Modified Claims” on Schedule 5 to Exhibit A.

**Compliance with the Objection Procedures and the Bankruptcy Rules**

15. The Debtors respectfully submit that the content of this objection is in full compliance with the Bankruptcy Rules and the Objection Procedures Order for the following reasons:

- (a) This objection conspicuously states on the first page the following (emphasis original): **“YOU SHOULD LOCATE YOUR NAME AND YOUR CLAIM(S) ON THE SCHEDULES ATTACHED HERETO. PLEASE TAKE NOTICE THAT YOUR CLAIM(S) MAY BE DISALLOWED, EXPUNGED, RECLASSIFIED, REDUCED, OR OTHERWISE AFFECTED AS A RESULT OF THE OBJECTION. THEREFORE, PLEASE READ THIS NOTICE AND THE ACCOMPANYING OBJECTION VERY CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE”**;<sup>6</sup>
- (b) This objection states the title and identity of the objecting party (the Debtors) and states the grounds for the objection;<sup>7</sup>
- (c) Pursuant to the Bankruptcy Rules and the Objection Procedures Order, the Debtors are authorized to file this objection on the grounds that:
  - i. the Amended Claims amend or supersede other claims;<sup>8</sup>
  - ii. the Duplicate Claims amend other Claims or duplicate other Claims;<sup>9</sup>

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<sup>6</sup> See Fed. R. Bankr. P. 3007(e)(1).

<sup>7</sup> See Fed. R. Bankr. P. 3007(e)(4).

<sup>8</sup> See Fed. R. Bankr. P. 3007(d)(3).

<sup>9</sup> See Fed. R. Bankr. P. 3007(d)(1), (3).

- iii. the Non-Debtor Claims have been filed in the wrong case;<sup>10</sup>
  - iv. the Unsupported Claims fail to provide sufficient documentation for the Claim;<sup>11</sup> and
  - v. the Inaccurately Supported Claims fail to sufficiently specify the basis for the Claim.<sup>12</sup>
- (d) Each schedule to **Exhibit A** includes only the Claims to which there is a common basis for the objection;<sup>13</sup>
  - (e) Each schedule to **Exhibit A** states the grounds for objecting to each claim and provides a cross-reference to the pages in the objection pertinent to the stated grounds;<sup>14</sup>
  - (f) Claimants subject to this objection are listed in alphabetical order by claimant name;<sup>15</sup>
  - (g) The objection is numbered consecutively with other omnibus objections filed by the Debtors;<sup>16</sup> and
  - (h) The objection contains no more than 250 claims.<sup>17</sup>

16. The Debtors further respectfully submit that notice and service of this objection will be in full compliance with the Bankruptcy Rules for the following reasons:

- (a) The objection will be filed with the Court and served upon (i) the affected claimant party set forth on each Proof of Claim subject to this objection or their respective attorney of record, (ii) the United States Trustee for the

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<sup>10</sup> See Fed. R. Bankr. P. 3007(d)(2); Objection Procedures Order, Exh. 1, ¶ 1.e.

<sup>11</sup> See Objection Procedures Order, Exh. 1, ¶ 1.d.

<sup>12</sup> See *id.*

<sup>13</sup> See Fed. R. Bankr. P. 3007(e)(2).

<sup>14</sup> See Fed. R. Bankr. B. 3007(e)(3).

<sup>15</sup> See Objection Procedures Order, Exh. 1, ¶ 4; Fed. R. Bankr. P. 3007(e)(2).

<sup>16</sup> See Fed. R. Bankr. P. 3007(e)(5).

<sup>17</sup> See Objection Procedures Order, Exh. 1, ¶ 3.

Southern District of New York (the “U.S. Trustee”), and (iii) parties that have filed a request for service of papers under Bankruptcy Rule 2002;<sup>18</sup>

- (b) With respect to service on claimants affected by this objection, the Debtors will also serve each such claimant with a customized objection notice tailored, as appropriate, to address the particular creditor, Claim, and objection;<sup>19</sup> and
- (c) This objection will be set for hearing at least 30 days after the filing of this objection.<sup>20</sup>

### **Reservation of Rights**

17. This objection is limited to the grounds stated herein. Accordingly, it is without prejudice to the rights of the Debtors or any other party in interest to object to any of the Claims listed on Schedules 1–5 to **Exhibit A**, including the “Remaining Claims” (to the extent not disallowed and expunged pursuant to this objection) on any grounds whatsoever, and the Debtors expressly reserve all further substantive or procedural objections they may have.

### **Motion Practice**

18. This objection includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated and a discussion of its application to this motion. Accordingly, the Debtors submit that this objection satisfies Local Rule 9013-1(a).

### **Notice**

19. The Debtors will provide notice of this Objection to the following parties or their respective counsel: (a) the U.S. Trustee; (b) counsel to the Committee; (c) the holders of the 50 largest unsecured claims against the Debtors (on a consolidated basis); (d) the United States Attorney’s Office for the Southern District of New York; (e) the Internal Revenue Service; (f) the

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<sup>18</sup> See Fed. R. Bankr. P. 2002, 3007(a).

<sup>19</sup> See Fed. R. Bankr. P. 3007(e).

<sup>20</sup> See Fed. R. Bankr. P. 3007(a).

offices of the attorneys general in the states in which the Debtors operate; (g) the Securities and Exchange Commission; (h) the holders of the Claims identified on Schedule 1, Schedule 2, Schedule 3, Schedule 4, and Schedule 5 of **Exhibit A**; and (i) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given

**No Prior Request**

20. No prior request for the relief sought in this objection has been made to this or any other court.

*[Remainder of page intentionally left blank]*

WHEREFORE, the Debtors respectfully request that the Court enter the Order granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

New York, New York  
Dated: February 19, 2023

/s/ Joshua A. Sussberg

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*Counsel to the Initial Debtors and Debtors in Possession*

*Proposed Counsel to the GK8 Debtors and Debtors in Possession*



**Exhibit A**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

CELSIUS NETWORK LLC, *et al.*,<sup>1</sup>

Debtors.

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**ORDER GRANTING DEBTORS' FIRST OMNIBUS OBJECTION TO CERTAIN  
(A) AMENDED CLAIMS, (B) DUPLICATE CLAIMS, (C) NON-DEBTOR CLAIMS  
(D) UNSUPPORTED CLAIMS, AND (E) INACCURATELY SUPPORTED CLAIMS**

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Upon the objection (the “Objection”)<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”) (a) disallowing and expunging the Claims identified on **Schedules 1–3** and (b) modifying the Claims identified on **Schedules 4–5** pursuant to sections 105 and 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Objection Procedures Order, all as more fully set forth in the Objection; and upon the Bixler Declaration; and the Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated February 1, 2012 and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Objection

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

<sup>2</sup> Capitalized terms used but not defined in this Order have the meanings given to such terms in the Objection.

is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that the Debtors provided appropriate notice of the Objection and the opportunity for a hearing on the Objection under the circumstances; and the Court having reviewed the Objection; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Objection is sustained as set forth herein.
2. The Amended Claims listed in the column labeled "Claims to be Disallowed" on **Schedule 1** attached hereto are disallowed and expunged in their entirety.
3. The Exact Duplicate Claims listed in the column labeled "Claims to be Disallowed" on **Schedule 2** attached hereto are disallowed and expunged in their entirety.
4. The "Remaining Claims" on **Schedules 1–2** attached hereto (the "Remaining Claims") will remain on the claims register maintained in the Debtors' chapter 11 cases (the "Claims Register") and such Claims are neither allowed nor disallowed at this time, subject, however, to any future objection on any basis. Nothing contained herein shall constitute, nor shall it be deemed to constitute, the allowance of any of the Remaining Claims.
5. The Non-Debtor Claims listed in on **Schedule 3** attached hereto are disallowed and expunged in their entirety.
6. Each Unsupported Claim on **Schedule 4** attached hereto is hereby modified to reflect the amount listed in the corresponding column entitled "Modified Claims," which matches the amounts listed in the Debtors' Schedules for such Claims.

7. Each Inaccurately Supported Claim on **Schedule 5** attached hereto is hereby modified to reflect the amount listed in the corresponding column entitled “Modified Claims,” which matches the amounts listed in the Debtors’ Schedules for such Claims.

8. Stretto, Inc., the Debtors’ noticing and claims agent, is authorized to update the Claims Register to reflect the relief granted in this Order.

9. Entry of this Order is without prejudice to the Debtors’ right to object to any other Claims in these chapter 11 cases or to further object to the Claims listed on **Schedules 1–5** attached hereto (to the extent they are not disallowed and expunged pursuant to this Order) on any grounds whatsoever, at a later date.

10. Each Objection by the Debtors to each Claim as addressed in the Objection and as identified in **Schedules 1–5** attached hereto constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Claim listed on **Schedules 1–5**. Any stay of this Order shall apply only to the contested matter that involves such Claim and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby.

11. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

12. The Debtors are authorized to take any and all actions reasonably necessary or appropriate to effectuate the relief granted pursuant to this Order in accordance with the Objection.

13. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

New York, New York  
Dated: \_\_\_\_\_, 2023

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THE HONORABLE MARTIN GLENN  
CHIEF UNITED STATES BANKRUPTCY JUDGE

**Schedule 1**

**Amended Claims**

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	A2E 300 S. GRAND AVE, 37TH FLOOR LOS ANGELES, CA, 90071	01/03/23	22-10964 (MTG) Celsius Network LLC	17265	\$52,316.31	A2E 300 S. GRAND AVE, 37TH FLOOR LOS ANGELES, CA, 90071	01/24/23	22-10964 (MTG) Celsius Network LLC	21824	\$52,316.31
2	AMINI, SHAHRIYAR ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	920	\$24,154.00	AMINI, SHAHRIYAR ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1392	\$24,154.00
3	ANTONINO FRANCESCO BISOINI ADDRESS ON FILE	08/09/22	22-10964 (MTG) Celsius Network LLC	6571	\$88,202.89	ANTONINO BISOGNI ADDRESS ON FILE	11/22/22	22-10964 (MTG) Celsius Network LLC	10256	\$88,299.16
4	BALTZ, JUSTIN ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	915	\$149,026.17	BALTZ, JUSTIN ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	949	\$149,026.17
5	BOYCE, CRISTINA DIANE ADDRESS ON FILE	07/18/22	22-10964 (MTG) Celsius Network LLC	63	\$210,837.70	BOYCE, CRISTINA DIANE ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	207	\$210,837.70
6	BROOKS, TIMOTHY ADDRESS ON FILE	08/05/22	22-10964 (MTG) Celsius Network LLC	5807	\$2,791.04	BROOKS, TIMOTHY ADDRESS ON FILE	10/03/22	22-10964 (MTG) Celsius Network LLC	9625	\$2,320.82
7	CHEN, JASON ADDRESS ON FILE	08/03/22	22-10964 (MTG) Celsius Network LLC	5287	\$103,030.71	CHEN, JASON ADDRESS ON FILE	08/03/22	22-10964 (MTG) Celsius Network LLC	5292	\$103,030.71

\*Indicates claim contains unliquidated and/or undetermined amounts

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
8	CHENARIDES II, DEAN C ADDRESS ON FILE	10/31/22	22-10964 (MTG) Celsius Network LLC	10077	\$34,387.00	DEAN C CHENARIDES II ADDRESS ON FILE	11/21/22	22-10964 (MTG) Celsius Network LLC	10242	\$56,818.00
9	CHRISTEN MOODY ADDRESS ON FILE	07/26/22	22-10964 (MTG) Celsius Network LLC	3049	\$67,390.27	CHRISTEN MOODY ADDRESS ON FILE	08/02/22	22-10964 (MTG) Celsius Network LLC	5093	\$73,455.28
10	COMPAGNO, CRISTIAN ADDRESS ON FILE	08/16/22	22-10964 (MTG) Celsius Network LLC	7319	\$12,479.71	COMPAGNO, CRISTIAN ADDRESS ON FILE	08/16/22	22-10964 (MTG) Celsius Network LLC	7322	\$12,479.71
11	CONTRARIAN FUNDS, LLC [AS ASSIGNEE OF BENJAMIN LANDRY] 411 WEST PUTNAM AVENUE SUITE 425 GREENWICH, CT 06830	08/06/22	22-10964 (MTG) Celsius Network LLC	6051	\$94,629.34	CONTRARIAN FUNDS, LLC [AS ASSIGNEE OF BENJAMIN LANDRY] 411 WEST PUTNAM AVENUE SUITE 425 GREENWICH, CT 06830	09/19/22	22-10964 (MTG) Celsius Network LLC	8970	\$94,646.32
12	CRIDER, CHARLES ADDRESS ON FILE	09/09/22	22-10964 (MTG) Celsius Network LLC	8633	\$4,679.91	CHARLES CRIDER ADDRESS ON FILE	09/27/22	22-10964 (MTG) Celsius Network LLC	9290	\$31,776.48
13	CRISTIAN COMPAGNO ADDRESS ON FILE	08/08/22	22-10964 (MTG) Celsius Network LLC	6482	\$10,393.97	COMPAGNO, CRISTIAN ADDRESS ON FILE	08/16/22	22-10964 (MTG) Celsius Network LLC	7322	\$12,479.71

\*Indicates claim contains unliquidated and/or undetermined amounts



## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
14 CYNTHIA LYNN FULLER ADDRESS ON FILE	07/27/22	22-10964 (MTG) Celsius Network LLC	3303	\$500.00	FULLER, CYNTHIA LYNN ADDRESS ON FILE	08/18/22	22-10964 (MTG) Celsius Network LLC	7507	\$500.00
15 DC DEPARTMENT OF INSURANCE, SECURITIES AND BANKING 1050 FIRST ST NE WASHINGTON, 20002	12/20/22	22-10964 (MTG) Celsius Network LLC	16390	\$32,340,000.00	DISTRICT OF COLUMBIA DEPARTMENT OF INSURANCE, SECURITIES & BANKING 1050 FIRST STREET, NE SUITE 801 WASHINGTON, 20002	12/21/22	All Debtors	16398	\$32,340,000.00*
16 DHANANI, NAZIR ADDRESS ON FILE	09/25/22	22-10964 (MTG) Celsius Network LLC	9176	\$602.78	DHANANI, NAZIR ADDRESS ON FILE	09/30/22	22-10964 (MTG) Celsius Network LLC	9533	\$602.78
17 DHANANI, NAZIR ADDRESS ON FILE	09/30/22	22-10964 (MTG) Celsius Network LLC	9534	\$602.78	DHANANI, NAZIR ADDRESS ON FILE	09/30/22	22-10964 (MTG) Celsius Network LLC	9533	\$602.78
18 DIAS, ANABELLE ADDRESS ON FILE	08/15/22	22-10964 (MTG) Celsius Network LLC	7194	Undetermined*	DIAS, ANABELLE ADDRESS ON FILE	08/30/22	22-10964 (MTG) Celsius Network LLC	8209	\$242,465.29
19 DOBBINS, CHARLES CODY ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1052	\$250,000.00	DOBBINS, CHARLES CODY ADDRESS ON FILE	08/03/22	22-10964 (MTG) Celsius Network LLC	5241	\$250,000.00

\*Indicates claim contains unliquidated and/or undetermined amounts

## Celsius Network LLC Case No. 22-10964 (MTG)

First Omnibus Objection  
Schedule 1 - Amended ClaimsCLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
20 DONALDSON, KELLY ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	472	\$4,019.63	DONALDSON, KELLY ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	476	\$4,010.42
21 ELLIS, ADAM JAMES ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	283	\$1,300.00	ELLIS, ADAM JAMES ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	294	\$1,300.00
22 ENRIQUE DE CASTRO ADDRESS ON FILE	08/03/22	22-10964 (MTG) Celsius Network LLC	5341	\$1,000.00	ENRIQUE DE CASTRO ADDRESS ON FILE	12/19/22	22-10964 (MTG) Celsius Network LLC	15598	\$1,000.00
23 ERIC G KENNY ADDRESS ON FILE	08/03/22	22-10964 (MTG) Celsius Network LLC	5186	\$4,000.00	ERIC KENNY ADDRESS ON FILE	11/21/22	22-10964 (MTG) Celsius Network LLC	10239	\$4,000.00
24 FONG, RAYMOND ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	864	\$51,726.86	FONG, RAYMOND ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	884	\$51,726.86
25 GFL ENVIROMENTAL ATTN: CINDY FOLLOWILL 14400 HERTZ QUAIL SPRING PARKWAY OKLAHOMA CITY, OK 73134	08/23/22	22-10964 (MTG) Celsius Network LLC	7886	\$52,379.52	AVAYA (PREVIOUSLY FILED AS GFL ENVIRONMENTAL) 14400 HERTZ QUAIL SPRING PARK OKLAHOMA, OK 73134	10/05/22	22-10964 (MTG) Celsius Network LLC	9713	\$57,833.77
26 GFL ENVIRONMENTAL 14400 HERTZ QUAIL SPRING PARK OKLAHOMA, OK 73134	09/14/22	22-10964 (MTG) Celsius Network LLC	8882	\$57,833.77	AVAYA (PREVIOUSLY FILED AS GFL ENVIRONMENTAL) 14400 HERTZ QUAIL SPRING PARK OKLAHOMA, OK 73134	10/05/22	22-10964 (MTG) Celsius Network LLC	9713	\$57,833.77

\*Indicates claim contains unliquidated and/or undetermined amounts

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
27 GUNAWAN WIBISONO ADDRESS ON FILE	11/09/22	22-10964 (MTG) Celsius Network LLC	10170	\$20,000.00	GUNAWAN WIBISONO ADDRESS ON FILE	11/09/22	22-10964 (MTG) Celsius Network LLC	10171	\$20,000.00
28 GURLEEN BHINDER ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1335	\$25,000.00	GURLEEN BHINDER ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1352	\$25,000.00
29 HOANG, NAM ADDRESS ON FILE	09/01/22	22-10964 (MTG) Celsius Network LLC	8332	\$92,000.00	HOANG, NAM ADDRESS ON FILE	10/10/22	22-10964 (MTG) Celsius Network LLC	9933	\$72,841.97
30 HUDSON, JONATHAN ADDRESS ON FILE	10/07/22	22-10964 (MTG) Celsius Network LLC	9865	\$1,843.17	JONATHAN HUDSON ADDRESS ON FILE	12/08/22	22-10964 (MTG) Celsius Network LLC	10309	\$1,843.17
31 HUMEL, STEVEN ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	252	\$6,100.00	HUMEL, STEVEN ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	264	\$6,100.00
32 INVICTUS CAPITAL FINANCIAL TECHNOLOGIES SPC - CRYPTO20 SP C/O HSM CORPORATE SERVICES LTD. 68 FORT STREET PO BOX 31726 GEORGE TOWN, GRAND CAYMAN KY1-1207	07/26/22	22-10964 (MTG) Celsius Network LLC	2928	\$9,926,644.34	INVICTUS CAPITAL FINANCIAL TECHNOLOGIES SPC - CRYPTO20 SP ATTN: THOMAS BRAZIEL 10830 SW 69 AVE PINECREST, FL 33156	11/18/22	22-10964 (MTG) Celsius Network LLC	10217	\$10,233,164.18

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
33 INVICTUS CAPITAL FINANCIAL TECHNOLOGIES SPC - CRYPTO20 SP C/O HSM CORPORATE SERVICES LTD. 68 FORT STREET PO BOX 31726 GEORGE TOWN, GRAND CAYMAN KY1-1207	08/11/22	22-10964 (MTG) Celsius Network LLC	6844	\$9,826,206.46	INVICTUS CAPITAL FINANCIAL TECHNOLOGIES SPC - CRYPTO20 SP ATTN: THOMAS BRAZIEL 10830 SW 69 AVE PINECREST, FL 33156	11/18/22	22-10964 (MTG) Celsius Network LLC	10217	\$10,233,164.18
34 JASON WEBER ADDRESS ON FILE	07/22/22	22-10964 (MTG) Celsius Network LLC	2326	\$113,836.11	JASON WEBER ADDRESS ON FILE	12/19/22	22-10964 (MTG) Celsius Network LLC	15593	\$113,836.11
35 JERONIMO TREVINO DE HOYOS ADDRESS ON FILE	07/22/22	22-10964 (MTG) Celsius Network LLC	2178	\$34,475.94	JERONIMO TREVINO DE HOYOS ADDRESS ON FILE	08/18/22	22-10964 (MTG) Celsius Network LLC	7512	\$64,475.94
36 JIRAPONGTANAVECH , BOONKIT ADDRESS ON FILE	08/04/22	22-10964 (MTG) Celsius Network LLC	5495	\$275.92	JIRAPONGTANAVECH, BOONKIT ADDRESS ON FILE	08/11/22	22-10964 (MTG) Celsius Network LLC	6793	\$288.71
37 JOACHIM ROBERT A LEBRUN ADDRESS ON FILE	09/06/22	22-10964 (MTG) Celsius Network LLC	8622	\$5,691,151.00	JOACHIM ROBERT A LEBRUN ADDRESS ON FILE	09/06/22	22-10964 (MTG) Celsius Network LLC	8623	\$56,911.51
38 JOHNSON , MELISSA LYNNE ADDRESS ON FILE	08/27/22	22-10964 (MTG) Celsius Network LLC	8019	\$4,941.64	JOHNSON, MELISSA LYNNE ADDRESS ON FILE	09/07/22	22-10964 (MTG) Celsius Network LLC	8559	\$5,023.21

\*Indicates claim contains unliquidated and/or undetermined amounts

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
39 JOSEPH BARRY ADDRESS ON FILE	07/28/22	22-10964 (MTG) Celsius Network LLC	3526	\$3,500.00	JOSEPH BARRY ADDRESS ON FILE	11/30/22	22-10964 (MTG) Celsius Network LLC	10279	\$15,000.00
40 JOVICA STOJANOVIC ADDRESS ON FILE	07/24/22	22-10964 (MTG) Celsius Network LLC	2433	\$925.66	STOJANOVIC, JOVICA ADDRESS ON FILE	09/01/22	22-10964 (MTG) Celsius Network LLC	8326	\$46,283.00
41 KAMILA SCHENK ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	222	\$4,988.82	KAMILA SCHENK ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	267	\$4,988.82
42 KAMILA SCHENK ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	234	\$4,988.82	KAMILA SCHENK ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	267	\$4,988.82
43 KAPLAN, PETER ADDRESS ON FILE	07/21/22	22-10964 (MTG) Celsius Network LLC	815	\$65,000.00	KAPLAN, PETER ADDRESS ON FILE	08/03/22	22-10964 (MTG) Celsius Network LLC	5297	\$65,000.00
44 KENNEDY, TYMOTHY ADDRESS ON FILE	08/02/22	22-10964 (MTG) Celsius Network LLC	4990	\$129,631.56	TYMOTHY KENNEDY ADDRESS ON FILE	01/20/23	All Debtors	21806	\$129,631.56
45 LEE, ELLEN ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	291	\$19,955.07	LEE, ELLEN ADDRESS ON FILE	07/21/22	22-10964 (MTG) Celsius Network LLC	1882	\$19,955.07
46 LESHOCK, DAVID ADDRESS ON FILE	07/25/22	22-10964 (MTG) Celsius Network LLC	7323	\$157,447.12	LESHOCK, DAVID ADDRESS ON FILE	08/16/22	22-10964 (MTG) Celsius Network LLC	7324	\$180,626.00

\*Indicates claim contains unliquidated and/or undetermined amounts

## Celsius Network LLC Case No. 22-10964 (MTG)

First Omnibus Objection  
Schedule 1 - Amended ClaimsCLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
47 MARGARONE, MAURIZIO ADDRESS ON FILE	10/07/22	22-10964 (MTG) Celsius Network LLC	9874	\$104,903.00	MAURIZIO MARGARONE ADDRESS ON FILE	12/19/22	22-10964 (MTG) Celsius Network LLC	15589	\$104,903.00
48 MARUCCIA, DANILO ADDRESS ON FILE	07/24/22	22-10964 (MTG) Celsius Network LLC	2550	\$2,583.75	MARUCCIA, DANILO ADDRESS ON FILE	12/12/22	22-10964 (MTG) Celsius Network LLC	15556	\$2,253.24
49 MIRANDA GEORGE ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1169	\$100,000.00	MIRANDA GEORGE ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1591	\$100,000.00
50 MIRANDA GEORGE ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1300	\$100,000.00	MIRANDA GEORGE ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1591	\$100,000.00
51 MIRANDA GEORGE ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1308	\$100,000.00	MIRANDA GEORGE ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1591	\$100,000.00
52 MOASE, DARRYL ADDRESS ON FILE	08/08/22	22-10964 (MTG) Celsius Network LLC	6438	Undetermined*	DARRYL MOASE [ESAOM MINING, INC.] ADDRESS ON FILE	10/05/22	22-10964 (MTG) Celsius Network LLC	9717	\$33,986.00
53 NAIR, SAJIV ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1613	\$34,411.96	NAIR, SAJIV ADDRESS ON FILE	09/01/22	22-10964 (MTG) Celsius Network LLC	8319	\$103,500.00
54 NICOLAS HERNANDEZ ADDRESS ON FILE	07/28/22	22-10964 (MTG) Celsius Network LLC	3446	\$39,815.67	NICOLAS HERNANDEZ ADDRESS ON FILE	08/03/22	22-10964 (MTG) Celsius Network LLC	5179	\$40,377.85

\*Indicates claim contains unliquidated and/or undetermined amounts

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
55 PATEL, PRAJESH GULU ADDRESS ON FILE	07/18/22	22-10964 (MTG) Celsius Network LLC	76	\$0.00	PRAJESH GULU PATEL ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1336	\$43,111.36
56 PATEL, PRIYANK GULU ADDRESS ON FILE	07/18/22	22-10964 (MTG) Celsius Network LLC	77	\$0.00	PRIYANK GULU PATEL ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1327	\$61,211.91
57 PHAROS FUND SP OF PHAROS MASTER FUND LP 3RD FLOOR, CITRUS GROVE 106 GORING AVENUE P.O. BOX 492 GEORGE TOWN, KY1-1106	12/19/22	22-10966 (MTG) Celsius Network Limited	15595	\$27,534,815.00	PHAROS FUND SP OF PHAROS MASTER SPC 3RD FLOOR, CITRUS GROVE 106 GORING AVENUE P.O. BOX 492 GEORGE TOWN, KY1-1106	01/19/23	22-10966 (MTG) Celsius Network Limited	21818	\$27,534,815.00
58 PHAROS FUND SP OF PHAROS MASTER FUND LP 3RD FLOOR, CITRUS GROVE 106 GORING AVENUE P.O. BOX 492 GRAND KAYMAN GEORGE TOWN, KY1-1106	12/19/22	22-10966 (MTG) Celsius Network Limited	15596	\$55,247,446.00	PHAROS USD FUND SP OF PHAROS MASTER SPC 3RD FLOOR, CITRUS GROVE 106 GORING AVENU P.O. BOX 492 GEORGE TOWN, KY1-1106	01/19/23	22-10966 (MTG) Celsius Network Limited	21817	\$55,247,446.00
59 PREUS, LINDA ADDRESS ON FILE	07/21/22	22-10964 (MTG) Celsius Network LLC	1537	Undetermined*	LINDA PREUS ADDRESS ON FILE	12/20/22	22-10964 (MTG) Celsius Network LLC	15599	\$52,000.00

\*Indicates claim contains unliquidated and/or undetermined amounts

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
60 RICHARD, SEONMI ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	365	\$13,856.42	RICHARD, SEONMI ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	424	\$13,856.42
61 RICHARD, SEONMI ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	367	\$13,856.42	RICHARD, SEONMI ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	424	\$13,856.42
62 RICHARD, SEONMI ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	407	\$16,044.94	RICHARD, SEONMI ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	427	\$16,044.94
63 RICHARD, SEONMI ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	419	\$16,044.94	RICHARD, SEONMI ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	427	\$16,044.94
64 RICK HOFFMANN ADDRESS ON FILE	11/03/22	22-10964 (MTG) Celsius Network LLC	10118	\$199,746.00	RICK HOFFMANN ADDRESS ON FILE	11/04/22	22-10964 (MTG) Celsius Network LLC	10119	\$1,997.46
65 ROUGIER, MARVIN ADDRESS ON FILE	09/05/22	22-10964 (MTG) Celsius Network LLC	8456	\$106,318.19	ROUGIER, MARVIN ADDRESS ON FILE	09/09/22	22-10964 (MTG) Celsius Network LLC	8666	\$106,318.19
66 SAAD HAMID ADDRESS ON FILE	11/10/22	22-10964 (MTG) Celsius Network LLC	10177	\$2,386.90	SAAD HAMID ADDRESS ON FILE	11/11/22	22-10964 (MTG) Celsius Network LLC	10179	\$4,770.83
67 SARA MARIA DE SOUSA JANOTA ADDRESS ON FILE	07/23/22	22-10964 (MTG) Celsius Network LLC	2345	\$10,975.00	JANOTA, SARA ADDRESS ON FILE	08/30/22	22-10964 (MTG) Celsius Network LLC	8162	\$10,570.00



## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
68 SETH GRAY ADDRESS ON FILE	12/19/22	All Debtors	16767	Undetermined*	SETH GRAY ADDRESS ON FILE	02/02/23	All Debtors	21852	\$509,017.06
69 SHIN, YEONSUN ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	350	\$18,188.48	SHIN, YEONSUN ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	351	\$18,188.48
70 SPECTRUM [CHARTER COMMUNICATIONS, BRIGHTHOUSE NETWORKS] 1600 DUBLIN ROAD COLUMBUS, OH 43215	07/29/22	22-10964 (MTG) Celsius Network LLC	3671	\$586.68	SPECTRUM [CHARTER COMMUNICATIONS, BRIGHTHOUSE NETWORKS] 1600 DUBLIN ROAD COLUMBUS, OH 43215	11/28/22	22-10964 (MTG) Celsius Network LLC	10276	\$1,985.68
71 TETREV, MATTI ADDRESS ON FILE	08/01/22	22-10964 (MTG) Celsius Network LLC	4508	\$650.00	TETREV, MATTI ADDRESS ON FILE	08/02/22	22-10964 (MTG) Celsius Network LLC	4949	\$641.86
72 THUY NGUYEN ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	642	\$0.00	THUY NGUYEN ADDRESS ON FILE	07/30/22	22-10964 (MTG) Celsius Network LLC	3876	\$173,523.12
73 TIBOR PETROVICZ ADDRESS ON FILE	08/01/22	22-10964 (MTG) Celsius Network LLC	4397	\$69,901.00	TIBOR PETROVICZ ADDRESS ON FILE	12/31/22	22-10964 (MTG) Celsius Network LLC	17221	\$27,626.10
74 TUTTLE, MARK ADDRESS ON FILE	07/17/22	22-10964 (MTG) Celsius Network LLC	43	\$380,767.27	TUTTLE, MARK ADDRESS ON FILE	07/17/22	22-10964 (MTG) Celsius Network LLC	44	\$380,767.27

\*Indicates claim contains unliquidated and/or undetermined amounts

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
75 VINCENZO JAMES CIARAVINO, III ADDRESS ON FILE	08/04/22	22-10964 (MTG) Celsius Network LLC	5557	\$837.62	VINCENZO JAMES CIARAVINO, III ADDRESS ON FILE	10/01/22	22-10964 (MTG) Celsius Network LLC	9554	\$837.62
76 VITOR MOROUÇO ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1136	\$1,386.81	VITOR MOROUÇO ADDRESS ON FILE	07/20/22	22-10964 (MTG) Celsius Network LLC	1148	\$1,386.81
77 VITTINI, AARON ADDRESS ON FILE	07/21/22	22-10964 (MTG) Celsius Network LLC	798	\$2,500.00	VITTINI, AARON ADDRESS ON FILE	10/07/22	22-10964 (MTG) Celsius Network LLC	9860	\$2,500.00
78 VOGT, BASTIEN ADDRESS ON FILE	07/29/22	22-10964 (MTG) Celsius Network LLC	3611	\$20,000.00	VOGT, BASTIEN ADDRESS ON FILE	08/04/22	22-10964 (MTG) Celsius Network LLC	5472	\$10,000.00*
79 WHEETLEY, JARED WAYNE ADDRESS ON FILE	08/06/22	22-10964 (MTG) Celsius Network LLC	6100	\$28,939.67	WHEETLEY, JARED WAYNE ADDRESS ON FILE	08/17/22	22-10964 (MTG) Celsius Network LLC	9378	\$12,319.91
80 WHEETLEY, JARED WAYNE ADDRESS ON FILE	08/06/22	22-10964 (MTG) Celsius Network LLC	6113	\$12,319.91	WHEETLEY, JARED WAYNE ADDRESS ON FILE	08/17/22	22-10964 (MTG) Celsius Network LLC	9378	\$12,319.91
81 YAMBO, LEONARD ADDRESS ON FILE	08/18/22	22-10964 (MTG) Celsius Network LLC	7502	\$35,350.77	YAMBO, LEONARD ADDRESS ON FILE	10/11/22	22-10964 (MTG) Celsius Network LLC	9938	\$36,223.41
82 YAMBO, LEONARD ADDRESS ON FILE	08/18/22	22-10964 (MTG) Celsius Network LLC	7513	\$32,350.77	YAMBO, LEONARD ADDRESS ON FILE	10/11/22	22-10964 (MTG) Celsius Network LLC	9938	\$36,223.41

\*Indicates claim contains unliquidated and/or undetermined amounts

Celsius Network LLC Case No. 22-10964 (MTG)

First Omnibus Objection

Schedule 1 - Amended Claims

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
83	YAMBO, LEONARD ADDRESS ON FILE	08/30/22	22-10964 (MTG) Celsius Network LLC	8194	\$35,250.77	YAMBO, LEONARD ADDRESS ON FILE	10/11/22	22-10964 (MTG) Celsius Network LLC	9938	\$36,223.41

**Schedule 2**

**Exact Duplicate Claims**

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 2 - Exact Duplicate Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	AHERN, EVAN ADDRESS ON FILE	08/12/22	22-10964 (MTG) Celsius Network LLC	9350	\$106,103.00	AHERN, EVAN ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	776	\$106,103.00
2	AVEDIKIAN, EDDIE WILLIAM ADDRESS ON FILE	07/18/22	22-10964 (MTG) Celsius Network LLC	313	\$15,053.00	AVEDIKIAN, EDDIE WILLIAM ADDRESS ON FILE	07/26/22	22-10964 (MTG) Celsius Network LLC	9110	\$15,053.00
3	BRITTON, JEREMY ADDRESS ON FILE	07/21/22	22-10964 (MTG) Celsius Network LLC	2045	\$46,008.17	BRITTON, JEREMY ADDRESS ON FILE	08/29/22	22-10964 (MTG) Celsius Network LLC	8094	\$46,008.17
4	BRUCK, ABRAHAM [AVROHOM BRUCK, ABRAHAM BRUCK AND ASSOCIATES] ADDRESS ON FILE	07/18/22	22-10964 (MTG) Celsius Network LLC	311	\$73,386.62	BRUCK, ABRAHAM [AVROHOM BRUCK, ABRAHAM BRUCK AND ASSOCIATES] ADDRESS ON FILE	08/05/22	22-10964 (MTG) Celsius Network LLC	9295	\$73,386.62
5	CANDELORE, CRAIG ADDRESS ON FILE	08/25/22	22-10964 (MTG) Celsius Network LLC	9410	\$506,821.91	CANDELORE, CRAIG ADDRESS ON FILE	08/19/22	22-10964 (MTG) Celsius Network LLC	7609	\$506,821.91
6	DAVID, FLORENT ADDRESS ON FILE	09/25/22	22-10966 (MTG) Celsius Network Limited	9164	\$50,000.00	DAVID, FLORENT ADDRESS ON FILE	09/25/22	22-10966 (MTG) Celsius Network Limited	9165	\$50,000.00
7	HAM, TAE YEONG ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	380	\$3,706.71	HAM, TAE YEONG ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	457	\$3,706.71
8	HOH, JIAN MENG ADDRESS ON FILE	09/06/22	22-10964 (MTG) Celsius Network LLC	5211	\$1,001.26	HOH, JIAN MENG ADDRESS ON FILE	09/06/22	22-10964 (MTG) Celsius Network LLC	8555	\$1,001.26

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 2 - Exact Duplicate Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
9	KIM CORTHOUT ADDRESS ON FILE	07/20/22	22-10965 (MTG) Celsius Network Inc.	1213	\$9,843.36	KIM CORTHOUT ADDRESS ON FILE	07/20/22	22-10965 (MTG) Celsius Network Inc.	1217	\$9,843.36
10	MOORE, LANCE ADDRESS ON FILE	08/01/22	22-10964 (MTG) Celsius Network LLC	4630	\$13,829.00	MOORE, LANCE ADDRESS ON FILE	10/03/22	22-10964 (MTG) Celsius Network LLC	9636	\$13,829.00
11	NEWELL, HEIDI ELISE ADDRESS ON FILE	08/22/22	22-10964 (MTG) Celsius Network LLC	9431	\$73,908.13	NEWELL, HEIDI ELISE ADDRESS ON FILE	08/26/22	22-10964 (MTG) Celsius Network LLC	9446	\$73,908.13
12	NOVAWULF DIGITAL PARALLEL MASTER FUND, L.P. ABBATE, MICHAEL 9 FEDERAL STREET EASTON, MD 21601	10/25/22	22-10970 (MTG) Celsius Lending LLC	10004	\$1,667,997.07	NOVAWULF DIGITAL PARALLEL MASTER FUND, L.P. ABBATE, MICHAEL 9 FEDERAL STREET EASTON, MD 21601	10/25/22	22-10970 (MTG) Celsius Lending LLC	10016	\$1,667,997.07
13	ORDONEZ, ELIZABETH ADDRESS ON FILE	10/24/22	22-10964 (MTG) Celsius Network LLC	10050	\$66,408.83	ORDONEZ, ELIZABETH ADDRESS ON FILE	10/24/22	22-10964 (MTG) Celsius Network LLC	21821	\$66,408.83
14	PLESKONKO. ALLISON ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	333	\$6,000.00	PLESKONKO. ALLISON ADDRESS ON FILE	07/19/22	22-10964 (MTG) Celsius Network LLC	388	\$6,000.00
15	RITHOLZ, SUSAN ADDRESS ON FILE	08/01/22	22-10965 (MTG) Celsius Network Inc.	4626	\$2,076,904.09	RITHOLZ, SUSAN ADDRESS ON FILE	08/01/22	22-10965 (MTG) Celsius Network Inc.	4631	\$2,076,904.09

## Celsius Network LLC Case No. 22-10964 (MTG)

## First Omnibus Objection

## Schedule 2 - Exact Duplicate Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT		NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
16	RITHOLZ, SUSAN ADDRESS ON FILE	08/01/22	22-10969 (MTG) Celsius Networks Lending LLC	4645	\$2,076,904.09		RITHOLZ, SUSAN ADDRESS ON FILE	08/01/22	22-10969 (MTG) Celsius Networks Lending LLC	4663	\$2,076,904.09
17	SUNG BUM BAE ADDRESS ON FILE	08/02/22	22-10964 (MTG) Celsius Network LLC	4813	\$20,000.00		SUNG BUM BAE ADDRESS ON FILE	08/02/22	22-10964 (MTG) Celsius Network LLC	4843	\$20,000.00
18	TERRANCE LADE ADDRESS ON FILE	07/22/22	22-10964 (MTG) Celsius Network LLC	1092	\$1,984,764.00		TERRANCE LADE ADDRESS ON FILE	08/10/22	22-10964 (MTG) Celsius Network LLC	6715	\$1,984,764.00
19	TRENTON KROL ADDRESS ON FILE	08/17/22	22-10964 (MTG) Celsius Network LLC	7382	\$597.94		TRENTON KROL ADDRESS ON FILE	08/17/22	22-10964 (MTG) Celsius Network LLC	7385	\$597.94
20	WORTHMAN, CHARLES JOSEPH ADDRESS ON FILE	08/17/22	22-10964 (MTG) Celsius Network LLC	7378	\$7,996.16		WORTHMAN, CHARLES JOSEPH ADDRESS ON FILE	08/17/22	22-10964 (MTG) Celsius Network LLC	7395	\$7,996.16

**Schedule 3**

**Non-Debtor Claims**



Celsius Network LLC Case No. 22-10964 (MTG)  
First Omnibus Objection  
Schedule 3 - Non-Debtor Claims

	Celsius Network LLC	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	ALISHA TATE ADDRESS ON FILE	01/22/2023	22-10964 (MTG) Celsius Network LLC	21813	\$30.00	Proof of Claim asserts a liability for \$30 on the basis of: "Goods sold that caused personal injury from containing stimulants". The debtor's business is unrelated to the manufacturing, sale, or distribution of energy drinks. As a result, the asserted liability is not an obligation of the debtor's and claim number 21813 should be disallowed.
2	BRYNLIE SHEARS ADDRESS ON FILE	01/22/2023	All Debtors	21918	Undetermined*	Proof of Claim asserts a liability for an undetermined amount on the basis of: "I used to drink them to try to work out". The debtor's business is unrelated to the manufacturing, sale, or distribution of energy drinks. As a result, the asserted liability is not an obligation of the debtor's and claim number 21918 should be disallowed.
3	MANDI CASUTT ADDRESS ON FILE	01/22/2023	22-10964 (MTG) Celsius Network LLC	21808	\$20.00	Proof of Claim asserts a liability for \$20 on the basis of: "Drink" "Groceries goods". The debtor's business is unrelated to the manufacturing, sale, or distribution of energy drinks. As a result, the asserted liability is not an obligation of the debtor's and claim number 21808 should be disallowed.
TOTAL					\$50.00*	

\*Indicates claim contains unliquidated and/or undetermined amounts

**Schedule 4**

**Unsupported Claims**

Celsius Network LLC Case No. 22-10964 (MTG)  
First Omnibus Objection  
Schedule 4 - Unsupported Claims

ASSERTED CLAIMS

MODIFIED CLAIMS

NAME	CLAIM #	CASE NUMBER / DEBTOR	ASSERTED AMOUNT	EARN	CUSTODY	WITHHELD	COLLATERAL	CASE NUMBER / DEBTOR	EARN	CUSTODY	WITHHELD	COLLATERAL
1 AARON TIMMINS ADDRESS ON FILE	4989	22-10964 (MTG) Celsius Network LLC	\$850,000.00					22-10964 (MTG) Celsius Network LLC	ADA 288.304455998004 BTC 1.41910255432938 CEL 7426.18130811469 DOT 543.352519184952 ETH 136.085303245993 LINK 178.216399983337 MATIC 0.00739322767925851 SGB 1613.89055541727 USDC 59.9066268680756 USDT ERC20 0.00994378072161515 XRP 0.000000155863315559			
2 ANDERSON, RYAN ADDRESS ON FILE	6831	22-10964 (MTG) Celsius Network LLC	\$1,000,000.00					22-10964 (MTG) Celsius Network LLC	AAVE 16.1258636439817 ADA 589.996896063061 AVAX 7.72675801878976 BTC 0.984060266246831 DOT 5.56468246022603 ETH 28.1608045309318 LINK 7.08048148124006 LTC 4.17823560576392 SNX 103.729766075517 SOL 72.474354450951 UNI 1408.93258336108 USDC 5718.24265594551	AVAX 0.730306671975688 BTC 0.00735684890894868 ETH 0.209162		
3 CARL LAMB ADDRESS ON FILE	967	22-10964 (MTG) Celsius Network LLC	\$500,000.00					22-10964 (MTG) Celsius Network LLC	BTC 5.73981146751032 CEL 16.1776263423523 ETH 28.9908672419557			
4 CARLOS L SANTO ADDRESS ON FILE	2770	22-10964 (MTG) Celsius Network LLC	\$5,713,231.00					22-10964 (MTG) Celsius Network LLC	ADA 15081.3345631179 BTC 0.465868030687404 ETH 10.5339220948156 LTC 21.2643718483986 MATIC 20961.587887066 USDC 137.572141077458 XRP 13857			
5 DANIEL, EDWIN H ADDRESS ON FILE	4601	22-10964 (MTG) Celsius Network LLC	\$579,140.64					22-10964 (MTG) Celsius Network LLC	AAVE 0.0126637977971779 ADA 709.117052085532 BTC 0.000177609713577184 CEL 1.22492567937119 ETH 2.60053530785671 LINK 0.0127452728211461 LUNC 23.9617714890347 MANA 0.0607727873412701 MATIC 17.3316831385954 SOL 0.00472329589327537 UNI 0.0870606316791597 USDC 21275.3626756063 USDT ERC20 7.81032942247361	ADA 87.1063594901656 BTC 0.0351871613288522 CEL 257.586541546602 ETH 0.000000083140370272 LINK 10.3636540154789 MATIC 59.7768435626529 SOL 53.5579146887868 USDC 0.003 XRP 2303.517364	BTC 8.90985556668853	
6 DANILO PINEDA ADDRESS ON FILE	230	22-10964 (MTG) Celsius Network LLC	\$650,000.00					22-10964 (MTG) Celsius Network LLC	ADA 25707.2353663367 BTC 1.54334607107852 DOT 229.7416781451 ETH 43.5301837300213 LINK 249.55114168746 MANA 2012.05215617311 MATIC 8121.41424479708 SNX 110.953775592081 SOL 142.981953701387 USDC 0.0485574580113423	BTC 0.5947551 ETH 3.295896 USDC 26145.391489		ADA 11314.1608736205
7 DEREK LE ADDRESS ON FILE	10245	22-10964 (MTG) Celsius Network LLC	\$445,000.00					22-10964 (MTG) Celsius Network LLC	LINK 0.967338101265169 MATIC 0.0640886031933697 SNX 24815.1289386327	LINK 6728.13819798973		
8 DIRK, AREND ADDRESS ON FILE	5468	22-10964 (MTG) Celsius Network LLC	\$333,000.00					22-10964 (MTG) Celsius Network LLC	BTC 0.0218389138393094 CEL 0.227826980904158 DASH 1.78817890269783 ETH 0.222044517228128 MATIC 2492.38462783203 OMG 33.0955308279277			

Celsius Network LLC Case No. 22-10964 (MTG)  
First Omnibus Objection  
Schedule 4 - Unsupported Claims

ASSERTED CLAIMS

MODIFIED CLAIMS

NAME	CLAIM #	CASE NUMBER / DEBTOR	ASSERTED AMOUNT	EARN	CUSTODY	WITHHELD	COLLATERAL	CASE NUMBER / DEBTOR	EARN	CUSTODY	WITHHELD	COLLATERAL
9 EDWARD ST. GEORGE COLE CERVANTES, CFO ADDRESS ON FILE	1371	22-10964 (MTG) Celsius Network LLC	\$1,000,000.00					22-10964 (MTG) Celsius Network LLC	AAVE 137.130863686712 BCH 22.7960455695202 BNT 3578.26033117998 BTC 0.0233796593956336 COMP 104.440387290602 DASH 74.233824946395 DOT 833.915528210035 ETH 148.213110492573 KNC 7706.40905035835 LINK 1392.74026520174 LTC 83.1890092851892 MATIC 42956.1310237312 OMG 2779.73592741013 PAXG 5.65673994135229 SNX 4882.03119592165 UNI 2070.21519776497 XLM 38584.062941319 ZRX 15982.7070311376	ETH 19.924147		BTC 15.1317394244048
10 GOMEZ, CHRISTOPHER T ADDRESS ON FILE	6092	22-10964 (MTG) Celsius Network LLC	\$2,070,000.00					22-10964 (MTG) Celsius Network LLC	BTC 10.2825751115594			BTC 20.43650865
11 JUCH, JAY Y ADDRESS ON FILE	5550	22-10964 (MTG) Celsius Network LLC	\$11,147,495.00					22-10964 (MTG) Celsius Network LLC	BTC 1.45210134819531 ETH 48.1973218978573 GUSD 2.46682217097669			
12 KRISTINA KNAPIC ADDRESS ON FILE	10187	22-10964 (MTG) Celsius Network LLC	\$2,359,346.00					22-10964 (MTG) Celsius Network LLC	BTC 1.44052905762483			
13 LAROCHE, OLIVIER ADDRESS ON FILE	4071	22-10964 (MTG) Celsius Network LLC	\$411,380.12					22-10964 (MTG) Celsius Network LLC	AAVE 35.9596076570581 ADA 0.000000857142857143 BNT 1383.2734768364 BTC 0.0333206553596678 CEL 25809.9533697152 ETH 28.3861022658594 KNC 192.187330137217 MATIC 1697.82814887678 UNI 428.871071522649 USDC 95.4642393292772			
14 LEAH PEARLMAN ADDRESS ON FILE	6511	22-10964 (MTG) Celsius Network LLC	\$2,500,000.00					22-10964 (MTG) Celsius Network LLC	ADA 39526.6286938894 AVAX 370.250847706343 BCH 76.2610537964316 BTC 10.2372763755633 DOT 1514.54260396498 ETH 203.940560148865 LUNC 548.946165628972 SOL 0.779412276028869 USDC 217620.572534862	BTC 6.704 SOL 0.000000000817148092 USDC 49950		
15 LILJENQUIST, BRANDON ADDRESS ON FILE	5314	22-10964 (MTG) Celsius Network LLC	\$1,300,000.00					22-10964 (MTG) Celsius Network LLC	AAVE 0.107675885110593 BTC 0.00170661723979205 CEL 6.65821710113993 COMP 0.0262184611640448 ETH 0.00003746077862203 KNC 0.556868322463145 MCDAI 63.7422904918355 SNX 1.7779012341069 UNI 0.146005362911056 USDC 3.92378100240884 XLM 3.36579869368466	BTC 26.5295542591643 ETH 95.1112059360731 USDC 13620.686475		BTC 8.47228037337142 ETH 123.709868637565
16 LOPES, JOAO MIGUEL PINHEIRO ADDRESS ON FILE	3048	22-10964 (MTG) Celsius Network LLC	\$577,369.00					22-10964 (MTG) Celsius Network LLC	BTC 0.047142880977144 ETH 0.868520420794493 USDC 0.36989082870234			

Celsius Network LLC Case No. 22-10964 (MTG)  
First Omnibus Objection  
Schedule 4 - Unsupported Claims

ASSERTED CLAIMS

MODIFIED CLAIMS

NAME	CLAIM #	CASE NUMBER / DEBTOR	ASSERTED AMOUNT	EARN	CUSTODY	WITHHELD	COLLATERAL	CASE NUMBER / DEBTOR	EARN	CUSTODY	WITHHELD	COLLATERAL
17 LOUIS, PAUL ADDRESS ON FILE	8743	22-10964 (MTG) Celsius Network LLC	\$500,000.00					22-10964 (MTG) Celsius Network LLC	1INCH 2904.0348902657 AAVE 0.0229580830222686 ADA 22636.6855370929 AVAX 340.433052370073 BAT 1.8196963382615 BTC 2.60586494269225 CEL 158.831879523288 DOT 1142.69079039988 ETH 38.6859162745627 LINK 1088.42126702053 LTC 0.00983872047709548 LUNC 83.9810143605971 MATIC 35322.73023853 PAX 233.974266539065 SOL 503.130245714513 SUSHI 1791.89451629574 USDT ERC20 13.41481367085	USDT ERC20 0.000000569191853538		
18 MADISON SAMPLE JR MD ADDRESS ON FILE	6275	22-10964 (MTG) Celsius Network LLC	\$550,492.71					22-10964 (MTG) Celsius Network LLC	BAT 0.000480622098001247 BCH 0.000005601063718697 BTC 0.000000353956963228 BUSD 0.941163724715197 CEL 71.2505781006217 DASH 0.00002115293381452 ETH 60.289526338394 LINK 2578.06486539556 LTC 0.000025010016420771 MATIC 33.0475335614256 OMG 0.0861568537968472 SGB 465.340076466681 SNX 2412.79913423509 UNI 0.000191229865186452 USDC 0.106650433739171 USDT ERC20 0.00411580190353484 XLM 0.00661722219706057 XRP 0.000000970498143356 ZEC 9.80536747821645 ZRX 0.000440703387153952	BAT 2.11817514635649 BCH 0.000008522666689213 BTC 0.00000657084268638 DASH 0.0534926889618715 ETH 4.00639426033321 LTC 0.000059640920086485 UNI 0.340359383223457 USDC 86.9476952855016 USDT ERC20 2.62042574519072 XLM 0.000553645509701487 ZRX 3.88520875453863		
19 MCFERRIN JR., WILLIAM JOSEPH ADDRESS ON FILE	4478	22-10964 (MTG) Celsius Network LLC	\$600,000.00					22-10964 (MTG) Celsius Network LLC	ADA 15.3751289243758 BTC 4.51355550471018 ETH 26.9747718657684 MATIC 10270.9774769108 SOL 18.5693209600052			
20 MUNENORI HINO ADDRESS ON FILE	1364	22-10964 (MTG) Celsius Network LLC	\$475,000.00					22-10964 (MTG) Celsius Network LLC		ADA 20000.45 BTC 1.19271569 DOT 14.2127894225048 ETH 22.0132503461005 LINK 1449.23598509 MATIC 20283.89 USDC 1249.38 XTZ 2249.667841		DOT 1003.29011057749
21 NEPHI EVANS ADDRESS ON FILE	1368	22-10964 (MTG) Celsius Network LLC	\$450,000.00					22-10964 (MTG) Celsius Network LLC	AAVE 7.79097462291034 ADA 2887.24561075194 BTC 0.529686261137655 DOT 20.3894258659152 ETH 19.1744470598415 LINK 0.116042962913291 MATIC 11212.712610167 USDC 7852.35678154376	ETH 0.0362176169324922		BTC 1.9443873443797 ETH 30.2966680027497
22 NEUMANN, JEFF ADDRESS ON FILE	6423	22-10964 (MTG) Celsius Network LLC	\$721,102.00					22-10964 (MTG) Celsius Network LLC	ADA 291.075121335496 CEL 0.392654445285534 DOT 6.8170281647278 MATIC 9773.30962907528 USDC 4.6107613614738	CEL 278.471409986006		ADA 92732.2852624546 DOT 7302.70107761334
23 NGUYEN HOANG NHUT ADDRESS ON FILE	4719	22-10964 (MTG) Celsius Network LLC	\$1,000,000.00					22-10964 (MTG) Celsius Network LLC	BTC 12.5456798403567 CEL 1.68059384106379 ETH 0.0022960632065941 MCDAI 70.6286058170644			

Celsius Network LLC Case No. 22-10964 (MTG)  
First Omnibus Objection  
Schedule 4 - Unsupported Claims

ASSERTED CLAIMS

MODIFIED CLAIMS

NAME	CLAIM #	CASE NUMBER / DEBTOR	ASSERTED AMOUNT	EARN	CUSTODY	WITHHELD	COLLATERAL	CASE NUMBER / DEBTOR	EARN	CUSTODY	WITHHELD	COLLATERAL
24 NOVAK, ZACHARY ADDRESS ON FILE	6732	22-10964 (MTG) Celsius Network LLC	\$493,161.45					22-10964 (MTG) Celsius Network LLC	AAVE 0.00215948741994968 ADA 0.289123564233767 BTC 2.2548958073692 CEL 0.308234717312204 DOT 0.188392405050301 ETH 0.000325839304299816 LINK 0.0268721562957924 MATIC 3.72407858540716 SOL 987.207775872925 UNI 0.000026517154104991 USDC 0.00372410845131811			
25 PADALYTSYA, DARYNA ADDRESS ON FILE	8392	22-10964 (MTG) Celsius Network LLC	\$6,311,124.00					22-10964 (MTG) Celsius Network LLC	ADA 1003.5993575785 BNB 1511.5 BTC 108.251411520941 CEL 749437.225012686 DOT 18.9 ETH 702.127321 MATIC 1539073.5906007 MCDAI 60 USDT ERC20 10000			
26 POPKIN, GREGG ROBERT ADDRESS ON FILE	5261	22-10964 (MTG) Celsius Network LLC	\$750,000.00					22-10964 (MTG) Celsius Network LLC	AAVE 47.7352762444882 BTC 5.13932987540601 CEL 150.901354885207 EOS 0.137506543887952 ETH 0.0598246803046876 LINK 704.509846452046 MATIC 7425.57628264445 UST 15001.30121 XLM 3.02319198393393	ETH 69.4471229531534 USDC 0.00631791310621932		
27 REESMAN, SCOTT J ADDRESS ON FILE	3961	22-10964 (MTG) Celsius Network LLC	\$6,000,000.00					22-10964 (MTG) Celsius Network LLC	BTC 0.000034139066498251 SOL 0.00164556680775945	BTC 0.171666811103532 SOL 6.23566922766026		
28 RICHARD HICKS ADDRESS ON FILE	2924	22-10965 (MTG) Celsius Network Inc.	\$650,000.00					22-10964 (MTG) Celsius Network LLC	ADA 1993.0957309096 BTC 9.13317618893035 ETH 20.8736853604161 LINK 168.864834662712 LTC 22.9202493657668 MATIC 28081.8428667077 SOL 579.054272944729 USDC 1595.70526437612			
29 ROSSNICK, RON ADDRESS ON FILE	4744	22-10964 (MTG) Celsius Network LLC	\$579,350.00					22-10964 (MTG) Celsius Network LLC	BTC 0.907544906301068 CEL 856.851183155561 DASH 4.53116576660602 ETH 29.8743308828173 MATIC 12212.2643547937 SNX 190.235617215934 USDC 220.712416132241 USDT ERC20 33.5774021349863 XRP 383.496347	CEL 1.08051893916345 ETH 0.00734810969208116		BTC 3.60953046131672 ETH 31.4521595454715
30 SHAW VRANA ADDRESS ON FILE	5559	22-10964 (MTG) Celsius Network LLC	\$1,000,000.00					22-10964 (MTG) Celsius Network LLC	BTC 10.8926331930723 DOT 545.588501182423 LINK 1750.12281439738 MATIC 10522.0922878484 UNI 307.558297967945 USDC 24.4408429286749	USDC 0.00433047280329036		
31 TAMIM ARYAN ADDRESS ON FILE	4916	22-10964 (MTG) Celsius Network LLC	\$580,333.00					22-10964 (MTG) Celsius Network LLC	ADA 0.112453621661227 BTC 0.15600506099393 DOT 0.166813885432922 ETH 1.29402413901079 MATIC 0.211439545474514			
32 VINCENT BERTRAND WILHELM-WENDLING ADDRESS ON FILE	6816	22-10964 (MTG) Celsius Network LLC	\$3,750,000.00					22-10964 (MTG) Celsius Network LLC	BTC 10.1699340203015 ETH 508.427872869677			

Celsius Network LLC Case No. 22-10964 (MTG)  
First Omnibus Objection  
Schedule 4 - Unsupported Claims

ASSERTED CLAIMS

MODIFIED CLAIMS

NAME	CLAIM #	CASE NUMBER / DEBTOR	ASSERTED AMOUNT	EARN	CUSTODY	WITHHELD	COLLATERAL	CASE NUMBER / DEBTOR	EARN	CUSTODY	WITHHELD	COLLATERAL
33 ZACHARY DAVIDSON ADDRESS ON FILE	5661	22-10964 (MTG) Celsius Network LLC	\$460,000.00					22-10964 (MTG) Celsius Network LLC	ADA 16218.9110663147 BAT 1.60391687922193 BTC 0.00045512755712357 DASH 2.45518924594155 DOT 1559.19903825679 EOS 0.079022556105374 ETH 52.4290308086198 LINK 539.928717128695 LTC 0.0371849182031036 SOL 59.3842170228804 UNI 0.693445269669056 USDC 6374.75485262555 USDT ERC20 38.8471411562906 XLM 1678.91639851103	BAT 0.00636527383953995 BTC 0.000000003736949722 EOS 0.0039340819972055 ETH 38.2947891835062 LTC 0.00000000469676061 UNI 0.000608993140283539 USDC 2458.03 USDT ERC20 183.735970321432		

**Schedule 5**

**Inaccurately Supported Claims**



Celsius Network LLC Case No. 22-10964 (MTG)  
First Omnibus Objection  
Schedule 5 - Inaccurately Supported Claims

ASSERTED CLAIMS

MODIFIED CLAIMS

NAME	CLAIM #	CASE NUMBER / DEBTOR	ASSERTED AMOUNT	EARN	CUSTODY	WITHHELD	COLLATERAL	CASE NUMBER / DEBTOR	EARN	CUSTODY	WITHHELD	COLLATERAL
1 DESTINY MINISTRIES INTERNATIONAL INC KURT HEISEY 2715 HAM BROWN ROAD KISSIMMEE, FL 34746	9506	22-10964 (MTG) Celsius Network LLC	\$765,269.27					22-10964 (MTG) Celsius Network LLC	ADA 43248.0054640658 BCH 41.1922442952836 BTC 0.00133831128943913 LINK 8982.04016838505			
2 DO KHENG TAN ADDRESS ON FILE	2916	22-10964 (MTG) Celsius Network LLC	\$633,830.00					22-10964 (MTG) Celsius Network LLC	BAT 13627.3632404547 BTC 10.7610447063023 BUSD 9.49657390346337 ETH 0.0455356706756976			
3 FERNÁNDEZ, ÁGATA LÓPEZ ADDRESS ON FILE	9799	22-10964 (MTG) Celsius Network LLC	\$1,731,931.00					22-10964 (MTG) Celsius Network LLC	BTC 0.860856596649963 CEL 1.86739701868163			
4 JACOB RING ROTH INVESTMENT TRUST JACOB J RING ADDRESS ON FILE	4687	22-10964 (MTG) Celsius Network LLC	\$899,837.00					22-10964 (MTG) Celsius Network LLC	BTC 4.78964705923314 ETH 126.42853774223 LTC 59.8102019596159			
5 JONES, JACQUELINE GILYARD ADDRESS ON FILE	3204	22-10964 (MTG) Celsius Network LLC	\$5,174,204.00					22-10964 (MTG) Celsius Network LLC	BTC 2.07356846285361 ETH 3.06241152298718			
6 KOLBECK, JESPER ADDRESS ON FILE	7630	22-10964 (MTG) Celsius Network LLC	\$552,102.00					22-10964 (MTG) Celsius Network LLC	BTC 0.0977972481137715 ETH 1.02641824379032 XRP 7719.57659130199			
7 MANSOURI, ZABILLO ADDRESS ON FILE	3188	22-10964 (MTG) Celsius Network LLC	\$574,622.60					22-10964 (MTG) Celsius Network LLC	AAVE 21.2954356761337 BTC 2.34961965148505 CEL 1000.94295800672 ETH 56.9249095530534 LINK 636.205981049488 MATIC 74150.6171843332 SGB 1.545171721252 SNX 756.280835754909 XRP 10.1050545638326			
8 MYERS, DANIEL ADDRESS ON FILE	5386	22-10964 (MTG) Celsius Network LLC	\$632,756.27					22-10964 (MTG) Celsius Network LLC	BTC 7.32305350690437 CEL 35.104335202512 ETH 32.7044065750849			
9 POANDY ALISJAHBANA ADDRESS ON FILE	4809	22-10964 (MTG) Celsius Network LLC	\$117,490,720,223,218,000,000.00					22-10964 (MTG) Celsius Network LLC	BNB 0.00761681643345125 BTC 0.454060386256429 ETH 2.04347698073648			
10 RING, JACOB J ADDRESS ON FILE	4642	22-10964 (MTG) Celsius Network LLC	\$2,449,040.00					22-10964 (MTG) Celsius Network LLC	BTC 8.28486200982573 CEL 49.1166954143098 ETH 131.486276322182 LTC 353.834765110356	BTC 20.38395539		
11 THOMPSON, GEOFFREY ADDRESS ON FILE	6729	22-10964 (MTG) Celsius Network LLC	\$769,262.00					22-10964 (MTG) Celsius Network LLC	BTC 0.595435502299755 CEL 9.40832323212175 ETH 150.683388501637 USDC 16.6973560903707		CEL 535.015118144548	

Celsius Network LLC Case No. 22-10964 (MTG)  
First Omnibus Objection  
Schedule 5 - Inaccurately Supported Claims

ASSERTED CLAIMS

MODIFIED CLAIMS

NAME		CLAIM #	CASE NUMBER / DEBTOR	ASSERTED AMOUNT	EARN	CUSTODY	WITHHELD	COLLATERAL	CASE NUMBER / DEBTOR	EARN	CUSTODY	WITHHELD	COLLATERAL
12	ZACH ALVAREZ ADDRESS ON FILE	3072	22-10964 (MTG) Celsius Network LLC	\$988,000.00					22-10964 (MTG) Celsius Network LLC	AAVE 16.1886632853173 BTC 5.011111103505304 COMP 0.0130550039023301 ETH 115.930501762548 KNC 0.0335853978139387 LINK 505.742497479496 MANA 0.0353702891515553 MATIC 3082.41857988037 SGB 0.701472119126085 SNX 0.867873995033283 UNI 417.887798471833 USDC 53926.8782168844 XLM 3.72803793941432 XRP 4.58860219031258			

**Exhibit B**

**Bixler Declaration**

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*Counsel to the Initial Debtors and Debtors in Possession*

*Proposed Counsel to the GK8 Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

CELSIUS NETWORK LLC, *et al.*,<sup>1</sup>

Debtors.

---

)  
) Chapter 11  
)  
) Case No. 22-10964 (MG)  
)  
) (Jointly Administered)  
)

**DECLARATION OF HOLDEN BIXLER  
IN SUPPORT OF DEBTORS' FIRST OMNIBUS OBJECTION TO CERTAIN  
(A) AMENDED CLAIMS, (B) DUPLICATE CLAIMS, (C) NON-DEBTOR CLAIMS,  
(D) UNSUPPORTED CLAIMS, AND (E) INACCURATELY SUPPORTED CLAIMS**

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I, Holden Bixler, declare under penalty of perjury:

1. I am a Managing Director at Alvarez & Marsal North America, LLC ("A&M").

The above-captioned debtors and debtors in possession (collectively, the "Debtors") retained

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

A&M and its subsidiaries, affiliates, agents, and independent contractors as restructuring advisors in connection with their chapter 11 cases.

2. As part of my current position, I am responsible for assisting the Debtors with certain claims management and reconciliation matters. I am generally familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and books and records that reflect, among other things, the Debtors' liabilities and the amounts thereof owed to their creditors as of the Petition Date.

3. I have read the *Debtors' First Omnibus Objection to Certain (A) Amended Claims, (B) Duplicate Claims, (C) Non-Debtor Claims, (D) Unsupported Claims, and (E) Inaccurately Supported Claims* (the "Objection"), filed contemporaneously herewith, and am directly, or by and through the Debtors' advisors and personnel, familiar with the information contained therein and the schedules attached thereto.<sup>2</sup>

4. I am authorized to submit this declaration (the "Declaration") in support of the Objection. All matters set forth in this Declaration are based on: (a) my personal knowledge; (b) my review of relevant documents; (c) my view, based on my experience and knowledge of the Debtors and the Debtors' operations, books and records, and personnel; (d) information supplied to me by the Debtors and by others at the Debtors' request; or (e) as to matters involving United States bankruptcy law or rules or other applicable laws, my reliance on the advice of counsel or other advisors to the Debtors. If called upon to testify, I could and would testify competently to the facts set forth herein.

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<sup>2</sup> Capitalized terms used in this Declaration and not defined have the meanings given to such terms elsewhere in the Objection.

5. To the best of my knowledge, information and belief, insofar as I have been able to ascertain after reasonable inquiry, considerable time and resources have been expended to ensure a high level of diligence in reviewing and reconciling the Proofs of Claim filed against the Debtors in these chapter 11 cases.

**A. Amended Claims.**

6. Upon a thorough review of the Proofs of Claim filed in these chapter 11 cases and the supporting documentation thereto, the Debtors have determined that the “Claims to be Disallowed” listed on Schedule 1 to Exhibit A to the Objection (the “Amended Claims”) have been amended and/or superseded by subsequently filed Proofs of Claim by the same claimant on account of the same liability. The Amended Claims have been amended and/or superseded by the corresponding “Remaining Claims” listed on Schedule 1. Accordingly, I believe the Amended Claims should be disallowed and expunged in their entirety.

**B. Exact Duplicate Claims.**

7. Upon a thorough review of the Proofs of Claim filed in these chapter 11 cases and the supporting documentation thereto, the Debtors have determined that the “Claims to be Disallowed” listed on Schedule 2 to Exhibit A to the Objection (the “Exact Duplicate Claims”) are mirror duplicates of other Proofs of Claim filed by or on behalf of the same claimant (or a successor thereto) on account of the same liabilities as to the same Debtor. The Exact Duplicate Claims assert the same underlying liability as identified by the corresponding “Remaining Claims” listed on Schedule 2. Accordingly, I believe the Exact Duplicate Claims should be disallowed and expunged in their entirety.

**C. Non-Debtor Claims.**

8. Upon a thorough review of the Proofs of Claim filed in these chapter 11 cases and the supporting documentation thereto, the Debtors have determined that the Non-Debtor Claims

listed on Schedule 3 to Exhibit A to the Objection are claims for which the Debtors are not liable. Accordingly, I believe that the Non-Debtor Claims should be disallowed and expunged in their entirety.

**D. Unsupported Claims.**

9. Upon a thorough review of the Proofs of Claim filed in these chapter 11 cases, the Debtors have determined that the Unsupported Claims listed on Schedule 4 to Exhibit A to the Objection do not provide any supporting documentation to support the amount of the claim as required by the Bar Date Order. Accordingly, I believe that the Unsupported Claims should be modified to the amounts listed in the “Modified Claims” columns, which match the amounts listed in the Debtors’ Schedules. Such amounts reflected in the Debtors’ Schedules are based on the Debtors’ books and records and are what the relevant claimant is entitled to, not any additional amount asserted but lacks supporting documentation.

**E. Inaccurately Supported Claims.**

10. Upon a thorough review of the Proofs of Claim filed in these chapter 11 cases and the supporting documentation thereto, the Debtors have determined that the Inaccurately Supported Claims listed on Schedule 5 to Exhibit A to the Objection do not provide supporting documentation matching the amount of the claim. Accordingly, I believe that the Inaccurately Supported Claims should be modified to the amounts listed in the “Modified Claims” columns, which match the amounts listed in the Debtors’ Schedules. Such amounts reflected in the Debtors’ Schedules are based on the Debtors’ books and records and are what the relevant claimant is entitled to, not any additional amount asserted that is unsupported by documentation.

11. Disallowance or expungement of the Claims as described herein and in the Objection will not affect the Surviving Claims, if any, which will remain on the Claims Register

unless withdrawn by the applicable claimants or otherwise disallowed by the Court, subject to the Debtors' right to object to such Claims in the future on any grounds permitted by applicable law.

12. Failure to disallow and expunge the Claims listed in the column titled "Claims to be Disallowed" on Schedules 1-3 to Exhibit A to the Objection could result in the relevant claimant receiving an unwarranted or double recovery against the Debtors, to the detriment of other creditors. Accordingly, I believe that the Court should grant the relief requested in the Objection.

13. Failure to modify the Claims listed in the column titled "Asserted Amount" on Schedules 4-5 to Exhibit A to the Objection could result in the relevant claimant receiving an unwarranted excessive recovery against the Debtors, to the detriment of other creditors. Accordingly, I believe that the Court should grant the relief requested in the Objection.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: February 19, 2023

Respectfully submitted,

/s/ Holden Bixler

Name: Holden Bixler

Title: Managing Director, Alvarez & Marsal North America, LLC